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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
APPROXIMATELY \$9,900.00 IN  
U.S. CURRENCY,  
  
Defendant.

2:20-MC-00155-KJM-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Robert Schwaner ("claimant"), by and through their respective counsel, as follows:

1. On or about April 2, 2020, claimant filed a claim in the administrative forfeiture proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,900.00 in U.S. Currency (hereafter "defendant currency"), which was seized on January 27, 2020.

2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the  
2 parties. That deadline is July 1, 2020.

3 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
4 August 31, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
6 subject to forfeiture.

7 5. Accordingly, the parties agree that the deadline by which the United States shall be  
8 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
9 alleging that the defendant currency is subject to forfeiture shall be extended to August 31, 2020.

10 Dated: 6/23/2020

McGREGOR W. SCOTT  
United States Attorney

11 By: /s/ Kevin C. Khasigian  
12 KEVIN C. KHASIGIAN  
13 Assistant U.S. Attorney  
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15 Dated: 6/23/2020

/s/ Jacek W. Lentz  
JACEK W. LENTZ  
Attorney for potential claimant  
Robert Schwaner

(Signature authorized by email)

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21 **IT IS SO ORDERED.**

22 DATED: July 22, 2020.

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24 CHIEF UNITED STATES DISTRICT JUDGE  
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